

My mother also attended adult education computing classes in the Friedman home, which she thoroughly enjoyed.

3. My memories of the computer classes themselves are overwhelmingly positive. Classes typically began with playing computer games for fun. To my knowledge, games with pornographic content, such as the game "Stroker" which was depicted in "Capturing the Friedmans," were at no time present in the classroom setting. The only game in which I recall any type of group involvement was "Eliza," a game where the computer essentially provided psychological counseling in response to one's input. Allegations of sexual group activities, such as the game "Leap Frog", also mentioned in the film, are patently ridiculous. Arnold Friedman conducted the classes, teaching the BASIC computer language and the fundamentals of designing simple programs. Jesse Friedman was there to provide assistance and presumably to also learn computer skills from his father.

4. I never witnessed Jesse touching any of the children, inappropriately or otherwise. I do not remember ever meeting either of the other Friedman sons or Jesse's friend, Ross Goldstein. The only other student not already mentioned whom I recall being in any of my classes was _____ who seemed to be something of a prodigy in computing.

5. During the investigation of Arnold and Jesse Friedman, the Nassau County Police Sex Crimes Unit visited our home twice. To the best of my recollection, it was during the first of these visits that both Detective Galasso and Detective Hatch questioned me in the dining alcove of our kitchen about my experiences in the classes. I told them that nothing happened to me. I remember vividly being taken into our

computer room alone with Detective Hatch, where he showed me the computer program, "Jerky Mouse," confiscated from the Friedman home. The program, which he told me had been confiscated from the Friedman home, consisted of a cartoon mouse masturbating. I told him that I had not ever seen it before. The detectives seemed to give up and leave. The second visit was made by Galasso alone. I remember extremely well that she spoke to my parents in the kitchen with the louver doors closed to keep me from hearing them. I eavesdropped through the doors and recall her telling my parents authoritatively that I had been both sodomized and forced to engage in oral sex with Arnold and that he had admitted in a jailhouse confession that I "was his personal favorite." I do not remember being given any opportunity to counter this charge and deny that anything of the sort had taken place.

6. I can also confirm that the identity of the individual with the e-mail account and screen name "NoleDreamer" is .

..)

7. In conclusion, I can state without reservation that I did not experience any form of abuse, sexual or otherwise, during the Friedmans' computer classes at 17 Piccadilly Road, nor did I witness any other children being abused.


RON GEORGALIS

Sworn before me this 30th day
of December 2003.


Notary Public

My Commission Expires Feb. 21, 2007

COUNTY COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

-----X
THE PEOPLE OF THE STATE OF NEW YORK,

-- against --

JESSE FRIEDMAN,

Defendant,
-----X

AFFIRMATION OF
DAVID KUHN, ESQ.

Indictment Nos.
67104, 67430, 69783

DAVID KUHN, ESQ., hereby swears, under penalties of perjury, that the following is true and correct:

1. I am an attorney duly admitted to practice law in the state of New York. I was admitted in March 1994 in the First Department. In or about early 2001, I worked as a legal advisor for the documentary film, "Capturing the Friedmans."

2. In or about March 2001, Andrew Jarecki, the director of the film, asked me to interview one of the individuals who had worked as a detective on the Friedman case – Wallene Jones. The interview was to be used in making the film.

3. Mr. Jarecki had located Detective Jones, who now lives in Atlanta, Georgia, and he had spoken to her on the phone. I called her and arranged to visit her in person so I could take down her recollections of her experience in the Friedman case. On March 10, 2001, I met with former detective Jones at her place of business, "Gems of Africa," in Atlanta, Georgia. We spoke for about an hour and a half.

4. I took careful notes when speaking to Ms. Jones. Quotations attributed to Ms. Jones in this affirmation are in her exact words.

5. Ms. Jones told me that she and her partner, William Hatch, were the lead

investigators on the Friedman case and worked from a list of former Friedman computer students provided to her by Fran Galasso. She and her partner conducted numerous interviews. They would arrive in plain clothes at the children's homes. She told me "we assumed all the kids [on the list] were involved." She stated that the detectives knew certain information about what happened, and that it was in their minds when they conducted the interviews.

6. Jones told me that she thought she had taken notes on the interviews with children when possible.

7. In the first home they visited, Jones and Hatch spoke to three brothers – ages eleven, twelve, and thirteen – each of whom had been a student in Arnold Friedman's computer classes. Jones recalled separating the boys from each other and from their parents for questioning. She told me that this had been done because "kids will never admit bad things in front of or to their parents." Further, she said that she thought she took notes on the interview she conducted, but could not be positive. "If I did they'd be in the file," she said. "I did not keep any of that stuff myself."

8. She told me that the boys indicated in general terms that "something bad" had happened to them, but not with much specific detail. She told me that it was common to establish a "very good rapport" with the children, and that this was done with the three boys. However, the parents refused to have their sons sign the statements prepared by the detectives after the interview.

9. Jones described one instance in which it took fifteen visits to a child's home before he declared that he had been abused. In interview sessions that lasted as long as four hours, the boy repeatedly denied being the victim of abuse. The boy "would

let us sit with him in his bedroom for hours, and he'd bring up every topic except sexual abuse. We played games with him, he showed us his computer, he'd do anything to avoid the subject." Jones added, "for a long time he had nothing to say, but we knew." On one occasion the boy jumped up and down, screaming, 'I have nothing to tell you! Nothing happened!' "[B]ut by then we already knew," Jones said, "so we kept coming back after that until he told us."

10. On the fifteenth visit, the detectives spoke with the boy in his room, after his mother promised to stay completely away from the boy's bedroom and not come in at all during the interview. They explained to her that they were going to stay "as long as it takes, that we were not going to leave until he told us. We were prepared to stay all night if need be."

11. The boy finally stated that he had been abused. Asked why it took the child fifteen interviews to make the accusation, Jones told me that this boy had suffered tremendous trauma and had "kept it deep inside." "I drew it out again," she said. She stated that the detectives did not return after that visit.

12. I asked Ms. Jones if there were any physical signs of abuse of the boy. She replied that she could not remember any. She remembered that on one visit, the boy shouted that "I have nothing to tell you" and that "nothing happened," but she and her partner still returned to question the boy, because they "already knew, so we kept coming back after that until he told us."

13. When I asked her about the media in the case, she told me that there had been a frenzy surrounding it, which died down after a while. She said that when another

child sexual abuse case arose, against a school bus driver named Robert Izzo, the intense attention sparked up again, as crazy as it ever was.

14. I affirm as an officer of the court to the truth of the matters asserted herein in the above document.

Dated: Nantucket, MA
January 6, 2004

 1/6/04
David Kuhn, Esq.

<http://news.mysanantonio.com/story.cfm?xlc=1131888>

Abuse experts assail movie

By Marina Pisano

San Antonio Express-News

Web Posted : 02/23/2004 12:00 AM

Oscar-nominated documentaries usually don't grab much attention amid all the megastar, big-budget films up for awards. But one is at the center of a controversy over the director's take on a well-publicized case of child sexual abuse.

Some child-abuse experts say the film hurts children by misleading the public about crimes against children and helping "create an environment that keeps victims silent."

In "Capturing the Friedmans" director Andrew Jarecki weaves together many interviews with old 8 mm home movies and videos to tell the story of admitted pedophile Arnold Friedman and teenage son Jesse. In 1987, they were accused of multiple counts of child molestation of boys at their home in affluent Great Neck, N.Y. While film critics say Jarecki artistically captures a clearly dysfunctional family facing a maelstrom of horrendous accusations, child abuse experts and the judge in the case say he has not captured the truth.

"The film gives the impression truth is elusive and maybe the Friedmans didn't molest boys. It leaves out information that, if included, wouldn't leave that doubt," says Joyanna Silberg, child psychologist and vice president of the Leadership Council on Child Abuse and Interpersonal Violence.

Abbey Boklan, the now-retired Nassau County judge who presided over both cases, has raised concerns, too, insisting there are no doubts about the Friedmans' guilt. "There never was an issue as to whether they were guilty or not. To me it (the film) is deliberately slanted."

Arnold Friedman was a respected science teacher and musician who taught computer classes in his basement to children, mostly boys, ages 8 to 13. Police first investigated him in connection with child pornography found in his home, then began interviewing his students, slowly piecing together the case for sodomy and other acts of molestation.

In 1988, the Friedmans confessed and pleaded guilty to multiple counts. Arnold died in prison in 1995. Jesse admitted molesting 13 boys, served 13 years and was paroled in 2001.

The documentary reveals Arnold had abused his younger brother when he was 8 and admitted having sex with boys. Jesse confessed to his lawyer prior to his plea that he had abused boys and disclosed that his father, Arnold, had abused him. He made the same admissions on television, later recanting.

The two-disc DVD version of the documentary released in January includes additional material that fuels doubts about Jesse's conviction. In fact, citing the DVD, Jesse's defenders filed a motion in Nassau County Court in January to annul his conviction. Boklan calls the second disc on the DVD "pure propaganda."

Efforts to reach Jarecki for comment were unsuccessful.

The National Center for Reason and Justice, an organization that helps people it believes were wrongly accused and convicted of sex offenses against children and adolescents, calls the Friedman case a miscarriage of justice.

The Friedmans "never should have been charged, and they never should have been convicted," says journalist Debbie Nathan, who is on the board of the National Center for Reason and Justice but doesn't speak for the organization.

Nathan, who was a consultant on the movie, investigated false accusations in child sexual abuse cases for eight years. She is co-author of "Satan's Silence: Ritual Abuse and the Making of a Modern American Witch Hunt," published in 1995. From 1998 to 2000, she was also a reporter for the San Antonio Current.

Over the years, Nathan argues, Arnold taught hundreds of children. Why didn't they come forward when they were raped?

Silberg, who has talked to victims in this case, says kids don't always tell. Arnold, like many pedophiles, "groomed" the pre-teen boys he thought would be likely to keep the secret. After molesting them, he threatened their families if they told.

Nathan became interested in the case when she read abstracts, which included statements from police investigators. She says documents show victims underwent hypnosis in therapy, which can trigger false accusations.

But Silberg and Boklan say the victims didn't undergo hypnosis until after they told their stories to police. They had hypnosis to deal with the effects of abuse, not to recall it.

In the end, Nathan says Arnold was a "nebbish," the kind of creepy guy kids stay away from. But she hopes the film succeeds in showing that he doesn't deserve to be demonized. "That guy should have never been around kids. That was so self-indulgent of him. But that's not what he was accused of."

Boklan says five victims have hired an attorney in the face of efforts to annul Jesse's conviction. She says the film "is great theater, but don't call it true."

Silberg says "whether or not Jarecki wins an Oscar, it is children in our society who are the big losers when the public is misled about sexual crimes against children. Films like this help to create an environment that keeps victims silent."

NBC Dateline NBC, January 27, 2004

Matt Lauer: Retired Judge Abbey Boklan who presided over the Friedman case says it has nothing to do with false memories.

Boklan: "This has to do with sick games. Sick games."

Lauer: She was privy to the Grand Jury testimony of fourteen boys who accused Jesse. They were never cross-examined. They were reportedly afraid to come forward because of threats that their families would be harmed, houses burned down, or nude photographs exposed. Judge Boklan says she heard from parents who realized in hindsight there were signs of abuse.

Boklan: "There were children who developed stutters. There were children who started having nightmares. There were children who started to bed-wet. School grades went down. All of these were indications that didn't make sense to these parents because they didn't understand what was happening."

Lauer: Judge Boklan says she has no second thoughts about the defendant who stood before her sixteen years ago.

Boklan: "He told me, under oath, that he was a guilty man, and why should I have any doubt now, because he comes back and says he's not guilty? Or because a film maker makes a film that leaves out a goodly portion of the evidence? Should I have a doubt because of that? No, I don't."

CNN -- Now with Paula Zahn, Feb. 18, 2004

ZAHN: And the judge who presided over the Friedmans' case joins us now. Abbey Boklan just recently retired from the Nassau County court.

Good to see you. Welcome.

ABBEY BOKLAN, FORMER NASSAU COUNTY JUDGE: Thank you.

ZAHN: Respond directly to what Andrew Jarecki just charged, basically, that you never had a doubt in your mind about the guilt of these two men, even though you hadn't even looked at the evidence.

BOKLAN: Well, first of all, I knew an awful lot about the case.

Let's start with what I knew about Jesse. I knew, when he was nine years of age, he was an emotionally disturbed child. That was consistent with his story later on that that's when the sexual abuse of his father began. When he was in ninth grade, he was incorrigible. He had rages that were uncontrolled and he was placed in a special school.

In that special school, he started on drugs. He was stoned every day on marijuana and LSD during the years that this abuse took place of the young boys in the computer school.

ZAHN: But that doesn't necessarily tell you at that point that he, himself, was guilty of harming children.

BOKLAN: No, but I'm up to the point now where he has an attorney. He has an attorney, in fact, his second attorney, who, when he says he's not guilty, gives him two lie-detector tests, which he fails. He then gives his attorney a full confession in detail of all of the things that he did to these children.

That confession was signed and notarized in the presence of Jesse's mother. I knew all of that. I also knew, when they came in to plea bargain with me -- that's to discuss whether I'd go along with the agreed-upon sentence -- that there was never an issue of whether he was guilty or not guilty.

ZAHN: What about the charge that there is evidence of police misconduct in this case? Do you concede that?

BOKLAN: Do I concede there's a charge or do I concede there was...

ZAHN: Concede that there was a problem with the way the case was investigated?

BOKLAN: No. No, I don't concede there was a problem with the case, the way the case was investigated. I concede that some of the detectives may have asked questions in a manner better than some of the others did.

Remember, there were six teams of two detectives out there speaking to these children. That's 12 in total. Now, some may have asked questions better than others. But I knew that, before the children ever even spoke to these detectives, they were manifesting symptoms of sexual abuse. It

was just, the parents didn't know what it meant. They were having nightmares. They were bed-wetting. They were dropping their grades in school. They were acting out.

One of the boys was sleeping with a bat under his bed. So, before the police ever even had a chance to talk to them, there was something going on in these children's lives.

ZAHN: And just a quick yes or no, so you're basically saying that these two men deserved every single day they've spent in prison?

BOKLAN: Yes.

ZAHN: Judge Boklan, thank you for reviewing the case with us tonight. Appreciate it.

BOKLAN: Thank you.

Nitebeat with Barry Nolan, February 26, 2004

Hosted by Barry Nolan, with Harvey Silverglate, Esq. and Eli H. Newberger, M.D.

Barry Nolan: Let's bring the judge in now. Judge you are coming up front and center in some of these discussions about this case and there is a motion right now, that wants to, Jesse is appealing his conviction, he wants his conviction overturned, and he is citing in his motion to move it out of the Long Island area the fact that they think you were against him from the get-go.

Abbey Boklan: Alright, well, you understand, of course, that I am retired. If I was not retired, and I was on the bench I, of course, would not be speaking out. I heard there is a change of venue. Of course it has nothing to do with me. I am not sitting on the bench. I assume what they are saying is that they feel no judge in Nassau County can be fair. Since I have seen the papers I really, have not seen the papers, I really don't want to respond on the legal merits of either the 440 motion or the change of venue. I will however respond.

Nolan: Well, okay, let's go back. Let's focus on the original trial.

Boklan: I'm sorry. I can't hear you.

Nolan: Let's focus on the original trial. This pleaded out. There was no original trial. This pleaded out. Were you totally satisfied that there was an enormous amount of evidence that, that supported these guilty pleas?

Boklan: Well, you have to understand when someone pleads guilty, the judge is not responsible for determining if there is enough evidence for them to swear under oath that they are guilty. There was never an issue brought before me that they weren't guilty. The defense attorney, when he came into chambers to discuss the plea that had been worked out between himself and the Assistant District Attorney, they told me he was guilty. I never plea bargain with anyone who says they are not guilty. Because then I say, "Just go to trial."

There was a tremendous amount of evidence that I was aware of since I had been requested by the defense attorney to read through the Grand Jury minutes and I was aware of many other things as well. However, when I was asked in the interview with Mr. Jarecki if I had any doubt as to their guilt, you're talking about fourteen years later when guilt an issue, guilt or not guilty not an issue. In fact, Mr. Jarecki never told me what the movie was about. He told me it was about a clown. He never indicated that there was an issue of whether they were guilty or not guilty.

{Discussion about evidence found in the house}

Boklan: Hello

Nolan: Go head judge, jump in.

Boklan: Actually, during the search this is the second search, there were two searches, they found three sexual aids, battery operated. One of them was indicated that it was small size. That is the accurate statement of what was found.

{Discussion about the transcript of the interrogation of one child by police detectives}

Nolan: Let's take the judge's question. Go head judge.

Boklan: What I was going to say is I have no knowledge that the tape exists. It's my understanding that what this is is notes taken by a defense attorney when he was listening to a tape. Most of the child's responses, in fact, are listed as inaudible. This is like third hand hearsay. But what's missing from the outtakes or the movie of Jarecki is the lie detector test that Jesse took initially and failed; the thirty-some-odd page confession that Jesse Friedman gave to his own attorney before he plead guilty before me which described in detail what he did to all of the children, although he had not read any of the statements of the children. This statement was transcribed, notarized and signed by Jesse Friedman in the presence of his mother. Now where is that in the movie and in the outtakes?

{commercial break}

Nolan: one of the things not mentioned in the film is a character, we never meet him, is Ross Goldstein, who was indicted on 118 counts of various sexual abuses. Cooperated with authorities and implicated Jesse Friedman before a Grand Jury. He pleaded guilty on March 22 to three counts of first degree sodomy, and one count of using a child in a sexual performance. He was sentenced to two to six years in prison. We never meet him. What happened to Him?

Harvey Silvergate: Well, he was charged after he would not cooperate and testify against the Friedmans. He was told that if he went to trial and was convicted he would be sentenced to up to twenty-five years. But, if he made a deal, and he testified against the Friedmans, he would get six months. What would you do if you were faced with that.

Nolan: Well, let's hear from the judge. Judge, you were there.

Boklan: Yes, I was there. I don't know where his information. Ross Goldstein – there never was a discussion of the amount of years that he would get until he agreed to cooperate with the District Attorney's office. In fact, I wasn't even privy initially to that agreement and didn't go along with it, which was later reversed by the Appellate Division because they said he relied on the promises of the Assistant District Attorney. However, Ross Goldstein had been picked out of year book photographs by the children who were able to identify him as the teenager that Jesse Friedman brought with him to participate in these terrible crimes. Jesse in tern, excuse me, Ross intern was able to pick out photographs of the children, name them correctly and was able to say exactly what had happened to those children. He had never seen the children's statement's. His

statements both before the Grand Jury and in statements given to the police were consistent in all material aspect with those of the children.

Silvergate: That's very easy to do when you're given a script. He was given a very short sentence, threatened with twenty five. What would any kid do?

{Discussion, phone call is taken}

Nolan: The judge wanted to jump in. Let me let the judge have her turn, because she is the judge.

Boklan: What I wanted to say is those children were never examined because it never came to a trial. We have since found out since this movie that at least one of the young men who have spoken to has permanent physical injury, an anal fissure, that was caused by an external thing that happened to him when he was young, and is developed very soon after the incidents involving the Friedmans.

You've gotta understand the true definition of sodomy, which is any penetration, no matter how slight. So, when people picture what was happening here they are not necessarily picturing what really occurred.

{Discussion, phone call is taken}

Nolan: One last word judge, go ahead.

Bokan: I just wanted to say remember, after he had plead guilty he went on the "Geraldo" show. His sentence was over and he told Geraldo and the audience of Geraldo not only was he was guilty but that he admitted to sexually abusing seventeen, more than he plead guilty to, and he talked about how remorseful he was and how his father had victimized him when he was younger.

Silvergate: All you have to do is watch the DVD and you'll understand why all this "I'm Guilty" took place.

In Their Own Words: Jesse's Victims Speak Out

On January 11, 2004, *Newsday* staff reporter Paul Vitello wrote an open letter to the 13 boys who the Friedman's were charged with abusing, challenging them to come forward. He states that "If an injustice was done to the Friedmans, you are honor bound to undo it." However, "If on the other hand no injustice was done, you have to defend yourselves - and other victims like you - and to explain to those unfamiliar with the sexual abuse of children why the cops were right to come back, and come back, until you were able to talk."

At this time, the victims are beginning to come forward. Although, they continue to protect their identities, Judge Boklan, the judge who presided over the Friedman case has authenticated that the following statements were made by victims or family members of victims that Jesse Friedman pled guilty to molesting.

- [Open Letter to the Academy Awards Committee](#)
- [Letter by John Doe to Judge Boklan](#)
- [Statement by the mother of one of Jesse Friedman's victims](#)

Open Letter to the Academy Awards Committee by two of the victims that Jesse confessed to abusing:

Dear Committee,

The Film "Capturing the Friedmans" about a case of child molestation in Great Neck, Long Island has been nominated for an Academy Award. We are two of the victims of Arnold and Jesse Friedman writing to you, asking you to hear out side of the story, writing on behalf of the other victims and ourselves. We were abused, tortured, and humiliated by Arnold and Jesse Friedman in computer classes in Arnold's basement. Many of us have physical scars from what was done to us; all of us have psychological scars. Although it has been 16 years, we live with the knowledge of these crimes every day of our lives. Some of us have had bad dreams, some of us slept with baseball bats under our bed for years for fear of reprisals. Many years ago, we thought we could not tell what was happening to us because we felt too guilty and embarrassed and were constantly threatened. Our parents thought Arnold was calling our houses so often because he was such a concerned teacher. His calls were to make sure we were not telling and to repeat the constant threats.

But we have worked through our suffering in therapy, and we are men now, no longer ashamed, some of us with families of our own, all of us embarking on a new life. And now one of the men who tortured and threatened us, Jesse Friedman, is being paraded like a celebrity while we have been left in the shadows, powerless, and voiceless once again.

Don't take our long journey towards healing away from us. Don't use our story to promote the agenda of a confessed child molester who destroyed our childhood and confessed numerous times.

We don't want the acclaim of this movie to keep other young boys who are being secretly abused silent for fear that their stories won't be believed. We don't want adults who might listen to the children turn a deaf ear, having seen the film and say, "These children are probably lying or exaggerating just like those Friedman victims in the movie." We did not lie. We did not exaggerate. We were never hypnotized to tell our stories. The director twisted the facts in the film to make it appear that way. We told the truth then and are telling the truth now.

We don't want the story of our suffering used to silence other victims of crimes. We want our own children to grow up in a world where it is safe for children to talk about abuse they are suffering and to get help quickly.

You are making a significant decision regarding which documentary film this year deserves the highest praise the film industry can offer. We are sure many factors go into your decision and don't know whether the feelings of the faceless subjects of this documentary are relevant to your considerations.

But we can tell you that if this film does win an Oscar, it will be won at the expense of silencing the plaintive voices of abused children once again, just as our own voices were silenced 16 years ago by the threats and intimidation of our tormentors, Arnold and Jesse Friedman.

Signed,

24 year old graduate student, abused by Jesse and Arnold Friedman

27 year old businessman, abused by Jesse and Arnold Friedman

Our identities are known and protected by Judge Abbey Boklan who presided over the case. She will authenticate that we are two victims of Jesse of Arnold Friedman

Letter from John Doe (one of the 13 victims that the Friedmans pled guilty to abusing).

"The following E-mail was received by me in January of 2004 from one of the thirteen victims of Jesse Friedman. Although there were more victims, these thirteen were acknowledged by Jessie Friedman in his guilty plea of December 20, 1988. The victim had been working on the E-mail for weeks before he sent it to me.

I have his permission to distribute it as I see fit to anyone or any organization including the media as long as his identity is kept confidential and the statement is distributed in its entirety."

— Hon. Abbey L. Boklan (February 12, 2004)

January 29, 2004

Dear Judge Boklan:

I am writing to you because I need your help. I was a victim of sexual abuse as a young child. There were many other children who were also abused by the same perpetrators, Arnold and Jessie Friedman. Arnold Friedman died in jail, but Jessie Friedman is now attempting to appeal his conviction with the help of a wealthy filmmaker, the producer of the film "Capturing the Friedmans." My concern is that during this appeal my privacy will be invaded. I am asking for you to help all of the victims who were involved in the criminal investigation of Arnold and Jessie Friedman. We want to protect our privacy from further invasion and it is my position that the State should provide that help.

You may or may be aware that a motion picture was made about this conviction, and that the director of the motion picture is planning to fund some type of appeal. I have recently become aware of the fact that this film has been nominated for an academy award. I am sure that the cinematography is excellent. I wish the director the best of luck in the pursuit of his award, however, I find his position as a financial supporter and advocate for Jessie Friedman's appeal questionable at best. It seems obvious that ancillary to this appeal is an opportunity for him to advertise himself for the purpose of furthering his professional career. He is biased due to the substantial stake that he has in the outcome of the appeal. The culmination of his life's work is his movie that is now aligned with the legal status of Jessie Friedman. A victory in the courtroom would validate his film as a so called "important work" that carries with it the force to impose its will upon our criminal justice system. What aspiring director would not desire such recognition as a social force to project his or her career into the stratosphere of the film-making industry? This director's cause is wrong and his purpose is self serving at my expense as well as at the expense of the other victims.

Arnold and Jessie Friedman violated my trust for them as educators by sexually abusing my classmates and I at their home where they purported to teach computer skills to young people. As a child I was often placed by my parents into the custody of others whether be it at school, or at an after school care program or at a summer camp. This seemed quite common among my peers and I was comfortable with trusting adults as authority figures.

Arnold and Jessie Friedman portrayed themselves as educators who would teach young children how to operate a computer. Many parents were quite enamored with the idea that their child should be equipped with the advantage of computer literacy as the computer technology boom began in the mid 1980's. It was under the guise of an educator, that Arnold and Jessie Friedman used computer technology to show young children pornography, to take photographs of young children reacting to that pornography, and to take photographs of sexual acts being performed by young children. I was seven years old when I was in the custody of Arnold and Jessie Friedman. At that time I did not understand the dynamics of human sexuality. I only understood fear. I became afraid of everything beyond my control. My childhood curiosity was replaced with an inherent distrust for adults, authority figures, and every unknown.

As a victim of sexual abuse perpetrated by Arnold and Jessie Friedman, I should not be obligated to bear any burden, for the purpose of justifying their conviction ex-post. The criminal justice system is an apparatus that society uses to enforce the standards of conduct necessary to protect individuals and the community. It operates by apprehending, prosecuting, convicting, and sentencing those members of the community who violate the basic rules of group existence. The action taken against lawbreakers is designed to serve three purposes beyond the immediate punitive purpose: 1) as a deterrent, 2) to remove dangerous people from the community, and 3) it gives society an opportunity to attempt to transform lawbreakers into law-abiding citizens. This system is imperfect. It is based in theories of retribution and punishment. Furthermore, the victims are entitled to closure, with no obligation lasting in perpetuity to certify, in whole or in part, the prosecution of the criminal defendant by the State ex-post.

I am now a twenty-four year old law student who has confronted my past. It seems absurd to me at this point that I may be subpoenaed by a court once again to authenticate my testimony that I gave to a grand jury as a seven year old child. It is my position that the State should protect me and all the other victims from having our privacy further invaded. As a victim of sexual abuse, I can tell you first hand how embarrassing it feels, despite having done nothing wrong. The sexual abuse was bad enough, but the process of being a part of an investigation and testifying before a grand jury was also very painful. It would be unjust for the State to abandon us now when our privacy may be threatened once again by Jessie Friedman, a convicted sex offender, and his ally, the director of the film "Capturing the Friedmans."

We need help to prevent our further exposure. Arnold and Jessie Friedman were found guilty of sexually abusing children. The Court determined there was no reasonable doubt that those defendants had committed those crimes. We victims bore our burden by participating in the investigation and testifying. I, nor any of the other victims, should now be placed in a position to defend the conviction of Arnold and Jessie Friedman ex-post. If there is anything that you can do to help us I would be eternally grateful.

Sincerely, John Doe

Statement by the mother of one of boys who Jesse Friedman pled guilty to molesting.

This statement was written by the mother of a victim. She is protecting the identity of the victim by not using her name. Her identity can be authenticated by Judge Abbey Boklan.

A mother of one of the boys who Jesse Friedman pled guilty to molesting (as confirmed by Judge Boklan) forwarded us a copy of a letter that she first sent to Dateline. She was very upset by a program which Jesse Friedman and Andrew Jarecki appeared. She was nauseated by Jesse's apparent lack of remorse or compassion for his victims. She was also struck by Jarecki's apparent ignorance of what abused children go through. She noted that her son had no desire to "discuss or revisit those experiences in any way with any one", and worried about the effect of the film on other children who are being abused.

With her permission, several excerpts from of her original letter appear below:

[B]ecause my psyche is not as vulnerable as my son's over this matter, I have the luxury of being able to consider the ramifications of the slant that has been put on the case by the movie and the consequent effect this could have on the prosecution of all child abuse cases.

This film and the talk circuit promoting Jesse Friedman's "innocence" in which Jarecki is participating could serve to undermine the possibility of justice for a growing group of victims: sexually abused children. Research as published recently shows that the sexual exploitation of children is an international billion dollar industry. These children, traumatized, innocent, naive, not even understanding what has been done to them, as was the case with my seven year old son at the time he was a victim of the Friedman's, are difficult enough to defend and protect as it is. I see this media circus that Jarecki has generated to promote his film, as an unjustified and cynical attack on the defenders of these children and therefore supportive of those who would victimize them, either for their own pleasure or for financial gain.

This is why I have spoken up.

What I would say to Mr. Jarecki's assertion that "there is no credible evidence of guilt" in the case against Jesse Friedman and his father, is that he used the information made available to him selectively and cynically to make the film that would create the most media buzz.

And to answer Jesse's challenge to the victims that he would be glad to have the chance to meet them; Jesse, the victims don't want to meet you, neither should they have to. And they don't want you to be able to do this again to other children.

COUNTY COURT : COUNTY OF NASSAU

THE PEOPLE OF THE STATE OF NEW YORK

- against -

ARNOLD FRIEDMAN and JESSE
FRIEDMAN,

Defendants.

THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, accuse the defendant
ARNOLD FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE,
committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the
1st day of September, 1987 to on or about the 25th day of November
1987, in the County of Nassau, State of New York, engaged in
deviate sexual intercourse with Barry Doe, a person less than
eleven years old, to wit: the defendant did contact the victim's
anus with the defendant's penis.

SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment,
further accuse the defendant, ARNOLD FRIEDMAN, of the crime of
SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the
1st day of April, 1987 to on or about the 30th day of June, 1987,
in the County of Nassau, State of New York, engaged in deviate
sexual intercourse with Kenneth Doe, a person less than eleven
years old, to wit: the defendant did contact the victim's anus
with the defendant's penis.

THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment,
further accuse the defendant, ARNOLD FRIEDMAN, of the crime of
SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the
1st day of April, 1987 to on or about the 30th day of June, 1987,
in the County of Nassau, State of New York, engaged in deviate
sexual intercourse with Kenneth Doe, a person less than eleven
years old, to wit: the defendant did contact the victim's anus
with the defendant's penis.

FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, knowing the character and content thereof he employed, authorized, or induced Kenneth Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while Arnold Friedman did contact the victim's anus with Arnold Friedman's penis.

FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, knowing the character and content thereof he employed, authorized, or induced Kenneth Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while Arnold Friedman did contact the victim's anus with Arnold Friedman's penis.

SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1987 to on or about the 25th day of November, 1987, in the County of Nassau, State of New York, subjected Barry Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1987 to on or about the 25th day of November, 1987, in the County of Nassau, State of New York, subjected Barry Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 30th day of April, 1987, in the County of Nassau, State of New York, subjected Barry Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, subjected George Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, subjected George Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, subjected George Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

TWELFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987,

in the County of Nassau, State of New York, subjected George Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1985 to on or about the 1st day of January, 1986, in the County of Nassau, State of New York, subjected Joseph Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, subjected Kenneth Doe, a person less than eleven years old, to sexual contact, to wit: the victim did touch the defendant's penis.

FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, subjected a person less than eleven years old, to sexual contact, to wit: Kenneth Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

SIXTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of April, 1987 to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, subjected Kenneth Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, on or about the 27th day of May, 1985, in the County of Nassau, State of New York, subjected William Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

EIGHTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of October, 1986 to on or about the 30th day of January, 1987, in the County of Nassau, State of New York, subjected William Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

NINETEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of AN ATTEMPT TO COMMIT THE CRIME OF SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1987 to on or about the 25th day of November, 1987, in the County of Nassau, State of New York, attempted to subject Barry Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did attempt to touch the victim's penis.

TWENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of AN ATTEMPT TO COMMIT THE CRIME OF SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1987 to on or about the 25th day of November, 1987, in the County of Nassau, State of New York, attempted to subject Barry Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did attempt to touch the victim's penis.

TWENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 30th day of April, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Barry Doe, a male child, less than sixteen years old, to wit: the defendant did show the victim magazines containing pictures of naked people.

TWENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 30th day of April, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Barry Doe, a male child, less than sixteen years old, to wit: the defendant did show the victim magazines containing pictures of naked people.

TWENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 30th day of April, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Barry Doe, a male child, less than sixteen years old, to wit: the defendant did show the victim the defendant's penis.

TWENTY-FOURTH COUNT

1 AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 25th day of November, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Barry Doe, a male child, less than sixteen years old, to wit: the defendant did show the victim magazines containing pictures of naked people and did show the victim the defendant's penis.

TWENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 30th day of April, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Barry Doe, a male child, less than sixteen years old, to wit: the defendant did show his penis to the victim.

TWENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of December, 1984 to on or about the 1st day of July, 1985, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Joseph Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled "Strip Poker" depicting a naked female.

TWENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of December, 1984 to on or about the 1st day of July, 1985, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Joseph Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled "Stroker" depicting a hand masturbating a penis.

TWENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1985 to on or about the 1st day of July, 1985, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Joseph Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled "Hands on X" depicting naked people.

TWENTY NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN of the crime of ENDANGERING THE WELFARE OF A CHILD committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1985 to on or about the 1st day of January 1986, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Joseph Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled Dirty Movie depicting a naked woman touching her vagina and a video disc entitled Stroker depicting a hand masturbating a penis.

THIRTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1985 to on or about the 1st day of January, 1986, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Joseph Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled Girls They Want to Have Fun depicting a naked woman masturbating.

THIRTY FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of December, 1984 to on or about the 31st day of January, 1986 in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Joseph Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see the following video discs: 1-Strip Poker, depicting a naked female, 2-Stroker, depicting a hand masturbating a penis, 3-Hands on X, depicting naked people, 4-Dirty Movie, depicting a naked woman touching her vagina and 5-Girls They Want to Have Fun, depicting a naked woman masturbating.

THIRTY SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant showed the victim magazines containing pictures of naked people.

THIRTY THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant showed the victim magazines containing pictures of naked people.

THIRTY FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant showed the victim magazines containing pictures of naked people.

THIRTY FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant showed the victim magazines containing pictures of naked people.

THIRTY SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant made the victim show the defendant his penis.

THIRTY SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant did show his penis to the victim.

THIRTY EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant did show his penis to the victim.

THIRTY NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1987, to on or about the 30th day of June, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Kenneth Doe, a male child, less than sixteen years old, to wit: the defendant did show his penis to the victim, the defendant made the victim show the defendant his penis and the defendant did show the victim magazines containing pictures of naked people.

FORTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, on or about the 27th day of May, 1985, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch the penis of a child less than sixteen years of age in the victim's presence.

FORTY FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, on or about the 27th day of May, 1985, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did place his penis between the buttocks of seven boys less than sixteen years of age in the victim's presence.

FORTY SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1985 to on or about the 30th day of April, 1985, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled Sex Style Test which asked sexually related questions.

FORTY THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch the penis of Jesse Friedman in the victim's presence.

FORTH FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch his penis to the anus of Jesse Friedman in the victim's presence.

FORTY FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch the penis of Arnold Friedman in the victim's presence.

FORTY SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch his penis to the anus of Arnold Friedman in the victim's presence.

FORTY SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD, FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a video disc entitled Mad Party Fucker depicting a story of an orgy at a mansion.

FORTY EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did slam the head of a child less than sixteen years of age into a wall and told the class that this is what would happen to people who told what was going on in the victim's presence.

FORTY NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch the penis of a child less than sixteen years of age in the victim's presence.

FIFTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 30th day of January, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did show the victim magazines containing pictures of naked people.

FIFTY FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1987, to on or about the 25th day of November, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did touch his penis to the anus of a child less than sixteen years of age in the victim's presence.

FIFTY SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1985, to on or about the 25th day of November, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did the following: 1-the defendant did touch the penis of a child less than sixteen years of age in the victim's presence; 2-the defendant did place his penis between the buttocks of seven boys less than sixteen years of age in the victim's presence; 3-the defendant permitted the victim to see a video disc entitled Sex Style Test which asked sexually related questions; 4-the defendant did touch the penis of Jesse Friedman in the victim's presence; 5-the defendant did touch his penis to the anus of Jesse Friedman in the victim's presence; 6-the defendant permitted the victim to see a video disc entitled Mad Party Fucker depicting a story of an orgy at a mansion; 7-the defendant did slam the head of a child less than sixteen years of age into a wall and told the class that this is what would happen to people who told what was going on in the victim's presence; 8-the defendant did show the victim magazines containing pictures of naked people and 9-the defendant did touch his penis to the anus of a child less than sixteen years of age in the victim's presence.

FIFTY THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of October, 1986, to on or about the 25th day of November, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the defendant did the following: 1-the defendant did touch the penis of Arnold Friedman in the victim's presence; 2-the defendant did touch his penis to the anus of Arnold Friedman in the victim's presence and 3-the defendant did touch the penis of a child less than sixteen years of age in the victim's presence.

FIFTY FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1987, to on or about the 25th day of November, 1987, in the County, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Barry Doe, a male child, less than sixteen years old, to wit: the defendant did show the victim magazines containing pictures of naked people.

All of the acts and transactions alleged in each of the several counts in this indictment are connected together and form part of a common scheme and plan.

Dated: December 7, 1987

Denis Dillon 10
DENIS DILLON
District Attorney

PLEASE TAKE NOTICE that in accordance with the provisions of Section 240.30 of the Criminal Procedure Law, I hereby demand that within twenty days of the date of service of this Demand, you disclose and make available to the District Attorney of Nassau County for inspection, photocopying, or testing, any written report or document or portion thereof, concerning a physical or mental examination, or scientific test, experiment, or comparisons, made by or at the request or direction of the defendant.

PLEASE TAKE FURTHER NOTICE that in accordance with the provisions of Section 250.20 of the Criminal Procedure Law I hereby demand from you and each of you that if you intend upon the trial of this indictment to offer, for any purpose whatever, testimony which may tend to establish your presence elsewhere than at the scene of the crime or crimes with which you are charged, at the time of their commission, you must, within eight days from the date of service of this Demand, serve upon the District Attorney of Nassau County, and file with this court, a copy thereof, a "notice of alibi" which shall set forth in detail the place or places where you claim to have been together with the names, post office addresses, residences and places of employment and the addresses thereof of the witnesses upon whom you intend to rely to establish your presence elsewhere than at the scene of the crime or crimes at the time of their commission.

If at the trial of this action the defendant calls such an alibi witness without having served a notice of alibi pursuant to the demand, or, if having served such a notice he calls a witness not specified therein, a motion will be made pursuant to the provisions of Section 250.20 of the Criminal Procedure Law to exclude any testimony of such witness relating to the alibi defense.

PLEASE TAKE FURTHER NOTICE that pursuant to Section 710.30 of the Criminal Procedure Law, the People intend to offer at the trial of this indictment evidence of oral and/or written statement(s) made to a public servant pertaining to the charge set forth in this indictment.

PLEASE TAKE FURTHER NOTICE that pursuant to Section 710.30 of the Criminal Procedure Law, during the trial of this matter, the People expect to introduce testimony identifying the defendant as a person who committed the offenses charged as set forth in this indictment, which testimony will be given by a witness (witnesses) who has (have) previously identified the defendant.

DENIS DILLON
District Attorney
Nassau County, New York

DA-26. 8/70

DA-1187. 9/71 Rev. 1/80

DA-65, DA-1831.3/73, Rev. 1/75

67430

COUNTY COURT : COUNTY OF NASSAU

THE PEOPLE OF THE STATE OF NEW YORK

—against—

ARNOLD FRIEDMAN and JESSE
FRIEDMAN,

Defendants.

THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, accuse the defendants,
ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of SODOMY IN
THE FIRST DEGREE,
committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Fred Doe, a person less than eleven years old, to wit: the defendant, ARNOLD FRIEDMAN did contact the victim's anus with the defendant ARNOLD FRIEDMAN'S penis while the defendant JESSE FRIEDMAN covered the victim's mouth.

SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by each other, from on or about the 31st day of December, 1986 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Fred Doe, a person less than eleven years old, to wit: the defendant, ARNOLD FRIEDMAN did contact the victim's anus with the defendant ARNOLD FRIEDMAN'S penis while the defendant JESSE FRIEDMAN was telling the victim to be quiet.

THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Fred Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, with the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 31st day of December, 1986 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Fred Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, with the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, with the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March,

1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Richard Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

TWELFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

SIXTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December,

1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Daniel Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

EIGHTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

NINETEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

TWENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's buttocks.

TWENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant, ARNOLD FRIEDMAN did touch the victim's buttocks after the defendant, JESSE FRIEDMAN, had pulled the victim's pants down.

TWENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis with the defendant's penis.

TWENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's buttocks.

TWENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 31st day of December, 1986 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, subjected Fred Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

TWENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Edward Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

TWENTY—SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Edward Doe, a person less than eleven years old, to sexual contact, to wit: the defendant, ARNOLD FRIEDMAN, did touch the victim's penis while the defendant, JESSE FRIEDMAN, held the victim.

TWENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Edward Doe, a person less than eleven years old, to sexual contact, to wit: the defendant, ARNOLD FRIEDMAN, did touch the victim's penis while the defendant, JESSE FRIEDMAN did touch the victim's buttocks with the defendant, JESSE FRIEDMAN'S, penis.

TWENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, subjected Edward Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

TWENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

THIRTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

THIRTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

THIRTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch the victim's penis.

THIRTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, subjected Keith Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

THIRTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Keith Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did touch his penis to the victim's back.

THIRTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of AN ATTEMPT TO COMMIT THE CRIME OF SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, attempted to subject Richard Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did attempt to touch the victim's penis.

THIRTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of AN ATTEMPT TO COMMIT THE CRIME OF SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, attempted to subject Richard Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did attempt to touch the victim's penis.

THIRTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of AN ATTEMPT TO COMMIT THE CRIME OF SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, attempted to subject Richard Doe, a person less than eleven years old, to sexual contact, to wit: the defendant did attempt to touch the victim's anus with the defendant's finger.

THIRTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Daniel Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch his penis to a boy's back.

THIRTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Fred Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a computer disc depicting naked people.

FORTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Fred Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant place his hand down the pants of several boys.

FORTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Fred Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant hit several boys.

FORTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Fred Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's penis being touched by several boys.

FORTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Fred Doe, a male child, less than sixteen years old, to wit: 1) the defendant permitted the victim to see a computer disc depicting naked people; 2) the victim observed the defendant place his hand down the pants of several boys; 3) the victim observed the defendant hit several boys and 4) the victim observed the defendant's penis being touched by several boys.

FORTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Fred Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant hit several boys.

FORTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a computer disc entitled "Dirty Movie" depicting a naked woman touching her vagina.

FORTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the defendant hit the victim.

FORTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

FORTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch his penis to a boy's back.

FORTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim was told by the defendant to pull his pants down.

FIFTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see magazines depicting pictures of naked people.

FIFTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant ARNOLD FRIEDMAN order a boy into a corner of a room where the defendant, ARNOLD FRIEDMAN, told him to remove his pants and rub his exposed penis up against the wall while the defendant, JESSE FRIEDMAN, touched his exposed penis to the boy's buttocks.

FIFTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: 1) the defendant permitted the victim to see a computer disc entitled "Dirty Movie" depicting a naked woman touching her vagina; 2) the defendant hit the victim; 3) the victim observed the defendant's exposed penis; 4) the victim observed the defendant touch his penis to a boy's back; 5) the victim was told by the defendant to pull his pants down; 6) the defendant permitted the victim to see magazines containing pictures of naked people and 7) the victim observed the defendant order a boy into a corner of a room where the defendant told him to remove his pants and rub his exposed penis up against the wall while JESSE FRIEDMAN touched his exposed penis to the boy's buttocks.

FIFTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 31st day of December, 1986 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch his exposed penis to a boy's buttocks.

FIFTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the defendant hit the victim.

FIFTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

FIFTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch his penis to a boy's back.

FIFTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant hit several boys.

FIFTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: 1) the defendant hit the victim; 2) the victim observed the defendant's exposed penis; 3) the victim observed the defendant touch his penis to a boy's back; 4) the victim observed the defendant hit several boys; 5) the victim observed the defendant touch his exposed penis to a boy's buttocks after ARNOLD FRIEDMAN had ordered the boy into a corner of a room and told him to remove his pants and rub his exposed penis up against the wall.

FIFTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 31st day of December, 1986 to on or about the 31st day of March, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Edward Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch his penis to a boy's back.

SIXTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Dennis Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see computer discs depicting naked people.

SIXTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of April, 1986 to on or about the 30th day of June, 1986, in the County of Nassau, State of New York, knowingly acted in a

manner likely to be injurious to the physical, mental and moral welfare of Dennis Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see computer discs depicting naked people.

SIXTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Dennis Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

SIXTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Dennis Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch a boy's penis.

SIXTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Dennis Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant, ARNOLD FRIEDMAN, contact a boy's anus with the defendant's penis while the defendant, JESSE FRIEDMAN, held the boy.

SIXTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of January, 1986 to on or about the 31st day of March, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Dennis Doe, a male child, less than sixteen years old, to wit: 1) the defendant permitted the victim to see computer discs depicting naked people; 2) the victim observed the defendant's exposed penis; 3) the victim observed the defendant touch a boy's penis; 4) the victim observed the defendant contact a boy's anus with the defendant's penis while JESSE FRIEDMAN held the boy.

SIXTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendants, ARNOLD FRIEDMAN and JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1987 to on or about the 25th day of November, 1987, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Richard Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant, ARNOLD FRIEDMAN, place his mouth on the defendant, JESSE FRIEDMAN'S, penis with his permission.

SIXTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Stephen Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant hit several boys.

SIXTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ARNOLD FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ARNOLD FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Michael Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to see a computer disc entitled "Strip Poker" depicting a naked female.

moral welfare of Keith Doe, a male child, less than sixteen years old, to wit: 1) the victim observed the defendant's exposed penis and 2) the victim observed the defendant's penis being touched by several boys.

All of the acts and transactions alleged in each of the several counts in this indictment are connected together and form part of a common scheme and plan.

Dated: February 1, 1988


DENIS DILLON
District Attorney

PLEASE TAKE NOTICE that in accordance with the provisions of Section 240.30 of the Criminal Procedure Law, I hereby demand that within twenty days of the date of service of this Demand, you disclose and make available to the District Attorney of Nassau County for inspection, photocopying, or testing any written report or document or portion thereof, concerning a physical or mental examination, or scientific test, experiment, or comparisons, made by or at the request or direction of the defendant.

PLEASE TAKE FURTHER NOTICE that in accordance with the provisions of Section 250.20 of the Criminal Procedure Law I hereby demand from you and each of you that if you intend upon the trial of this indictment to offer, for any purpose whatever, testimony which may tend to establish your presence elsewhere than at the scene of the crime or crimes with which you are charged, at the time of their commission, you must, within eight days from the date of service of this Demand, serve upon the District Attorney of Nassau County, and file with this court, a copy thereof, a "notice of alibi" which shall set forth in detail the place or places where you claim to have been together with the names, post office addresses, residences and places of employment and the addresses thereof of the witnesses upon whom you intend to rely to establish your presence elsewhere than at the scene of the crime or crimes at the time of their commission.

If at the trial of this action the defendant calls such an alibi witness without having served a notice of alibi pursuant to the demand, or, if having served such a notice he calls a witness not specified therein, a motion will be made pursuant to the provisions of Section 250.20 of the Criminal Procedure Law to exclude any testimony of such witness relating to the alibi defense.

PLEASE TAKE FURTHER NOTICE that pursuant to Section 710.30 of the Criminal Procedure Law, the People intend to offer at the trial of this indictment evidence of oral and/or written statement(s) made to a public servant pertaining to the charge set forth in this indictment.

PLEASE TAKE FURTHER NOTICE that pursuant to Section 710.30 of the Criminal Procedure Law, during the trial of this matter, the People expect to introduce testimony identifying the defendant as a person who committed the offenses charged as set forth in this indictment, which testimony will be given by a witness (witnesses) who has (have) previously identified the defendant.

DENIS DILLON
District Attorney
Nassau County, New York

DA-56. 8/70

DA-1187. 9/71 Rev. 1/80

FD NO.

67430

COUNTY COURT : COUNTY OF NASSAU

THE PEOPLE OF THE STATE OF NEW YORK

— against —

ARNOLD FRIEDMAN and JESSE FRIEDMAN,

Defendant s.

DENIS DILLON
District Attorney

INDICTMENT FOR

SODOMY IN THE FIRST DEGREE (3 Counts as to A. Friedman), (4 Counts as to J. Friedman), (2 Counts as to both defts.); SEXUAL ABUSE IN THE FIRST DEGREE (15 Counts as to A. Friedman), (7 Counts as to J. Friedman), (3 Counts as to both defts.); AN ATTEMPT TO COMMIT THE CRIME OF SEXUAL ABUSE IN THE FIRST DEGREE (2 Counts as to A. Friedman), (1 Count as to J. Friedman), and ENDANGERING THE WELFARE OF A CHILD (35 Counts as to A. Friedman), (16 Counts as to J. Friedman) and (3 Counts as to both defts.)

A TRUE BILL

William J. Peyer
Foreman

A-1430

COUNTY COURT : COUNTY OF NASSAU

THE PEOPLE OF THE STATE OF NEW YORK

- against -

JESSE FRIEDMAN and ROSS GOLDSTEIN
(as a juvenile offender under Counts:
2, 4, 6, 8, 42, 109, 110, 111, 112,
113, 114, 121, 122, 123 and 124),

Defendants

Ind
69783

THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant FRIEDMAN did contact the victim's anus with the defendant FRIEDMAN's penis while the defendant GOLDSTEIN was holding the victim.

SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, a juvenile offender, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe by forcible compulsion.

THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant GOLDSTEIN did contact the victim's anus with the defendant GOLDSTEIN's penis while the defendant FRIEDMAN was holding the victim.

FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, a juvenile offender, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe by forcible compulsion.

FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant FRIEDMAN did contact the victim's anus with the defendant FRIEDMAN's penis while the defendant GOLDSTEIN was holding the victim.

SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe by forcible compulsion.

SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant GOLDSTEIN did contact the victim's anus with the defendant GOLDSTEIN's penis while the defendant FRIEDMAN held the victim.

EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe by forcible compulsion.

NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant FRIEDMAN did contact the victim's anus with the defendant FRIEDMAN's penis while the defendant GOLDSTEIN held the victim.

TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe by forcible compulsion.

ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant FRIEDMAN did contact the victim's anus with the defendant FRIEDMAN's penis while the defendant GOLDSTEIN held the victim.

TWELFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe by forcible compulsion.

THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant GOLDSTEIN did contact the victim's anus with the defendant GOLDSTEIN's penis while the defendant FRIEDMAN held the victim.

FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendants, JESSE FRIEDMAN and ROSS GOLDSTEIN, individually and aiding and abetting and being aided and abetted by each other, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe by forcible compulsion.

FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by John Roe, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis while John Roe held the victim.

SIXTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by John Roe, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986 in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe by forcible compulsion.

SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis while Wayne Roe held the victim..

EIGHTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

NINETEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis while Wayne Roe held the victim.

TWENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

TWENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or

about the 15th day of December, 1986 to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis while Arnold Friedman held the victim.

TWENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

TWENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis while Arnold Friedman held the victim.

TWENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

TWENTY FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, individually, and aiding and abetting and being aided and abetted by Wayne Roe from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis while Wayne Roe held the victim.

TWENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, individually, and aiding and abetting and being aided and abetted by Wayne Roe from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

TWENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, individually and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 15th day of December, 1986, to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis while Wayne Roe held the victim.

TWENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 15th day of December, 1986, to on or about the 27th day of

March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

TWENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 15th day of December, 1986, to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis while Wayne Roe held the victim.

THIRTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, individually, and aiding and abetting and being aided and abetted by Wayne Roe, from on or about the 15th day of December, 1986, to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, by forcible compulsion.

THIRTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Patrick Doe by forcible compulsion.

THIRTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 1st day of January, 1987, to on or about the 1st day of

April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Patrick Doe by forcible compulsion.

THIRTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Patrick Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis while Arnold Friedman did contact the victim's anus with Arnold Friedman's penis.

THIRTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, individually and aiding and abetting and being aided and abetted by Arnold Friedman, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Patrick Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis while Arnold Friedman did contact the victim's anus with Arnold Friedman's penis.

THIRTY-FIFTH

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

THIRTY-SIXTH

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe by forcible compulsion.

THIRTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

THIRTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

THIRTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

FORTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with William Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

FORTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, compelled another to engage in deviate sexual intercourse with James Doe by forcible compulsion.

FORTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with James Doe by forcible compulsion.

FORTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Lawrence Doe by forcible compulsion.

FORTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Lawrence Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FORTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Lawrence Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FORTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

FORTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 15th day of December, 1986, to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

FORTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 15th day of December, 1986, to on or about the 27th day of March, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Dennis Doe by forcible compulsion.

FORTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FIFTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FIFTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FIFTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

FIFTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

FIFTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

FIFTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

FIFTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

FIFTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

FIFTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

FIFTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

SIXTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

SIXTY FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

SIXTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

SIXTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

SIXTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

SIXTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

SIXTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

SIXTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

SIXTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

SIXTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

SEVENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

SEVENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

SEVENTH-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986,

in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate

sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

SEVENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

EIGHTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

EIGHTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

EIGHTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

EIGHTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

EIGHTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

EIGHTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

EIGHTY-SIXTH COUNT

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The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

EIGHTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

EIGHTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

EIGHTY-NINTH COUNT

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The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

NINETIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

NINETY FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

NINETY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

NINETY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

NINETY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

NINETY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

NINETY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

NINETY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

NINETY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

NINETY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDREDTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED TWELFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim placed his mouth on the defendant's penis.

ONE HUNDRED SIXTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim placed his mouth on the defendant's penis.

ONE HUNDRED SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim placed his mouth on the defendant's penis.

ONE HUNDRED EIGHTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim placed his mouth on the defendant's penis.

ONE HUNDRED NINETEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim placed his mouth on the defendant's penis.

ONE HUNDRED TWENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim placed his mouth on the defendant's penis.

ONE HUNDRED TWENTY-FIRST COUNT

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The defendant, ROSS GOLDSTEIN, a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED TWENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED TWENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED TWENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, a juvenile offender, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, a juvenile offender, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED TWENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED TWENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED TWENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED TWENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986, to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED TWENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED THIRTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED THIRTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st

day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED THIRTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED FORTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED FORTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED FORTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FORTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FORTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FORTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED FORTY-SIXTH: COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED FORTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE; committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED FORTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FORTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FIFTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuses the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe by forcible compulsion.

ONE HUNDRED FIFTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED FIFTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED FIFTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986, to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Daniel Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED FIFTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Patrick Doe, by forcible compulsion.

ONE HUNDRED FIFTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Patrick Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED FIFTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED FIFTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED FIFTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED FIFTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did place his mouth on the victim's penis.

ONE HUNDRED SIXTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SIXTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SIXTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SIXTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED SIXTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED SIXTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the

County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED SIXTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SIXTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SIXTY-EIGHTH COUNT

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The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SIXTY-NINTH COUNT

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ONE HUNDRED SEVENTIETH COUNT

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The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED SEVENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SEVENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED SEVENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED SEVENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED SEVENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED SEVENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SEVENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED SEVENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED SEVENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987, to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED EIGHTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED EIGHTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED EIGHTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the defendant did contact the victim's anus with the defendant's penis.

ONE HUNDRED EIGHTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the

County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED EIGHTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did contact the defendant's anus with the victim's penis.

ONE HUNDRED EIGHTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED EIGHTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED EIGHTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, by forcible compulsion.

ONE HUNDRED EIGHTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED EIGHTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED NINETIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of March, 1987, to on or about the 1st day of July, 1987, in the County of Nassau, State of New York, engaged in deviate sexual intercourse with Gregory Doe, a person less than eleven years old, to wit: the victim did place his mouth on the defendant's penis.

ONE HUNDRED NINETY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced William Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim engaged in a game entitled "Simon Says" wherein acts of sexual abuse were committed.

ONE HUNDRED NINETY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced William Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim engaged in a game entitled "Leap Frog" wherein acts of sexual abuse were committed.

ONE HUNDRED NINETY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced William Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim engaged in a game entitled "Super Hero" wherein acts of sexual abuse were committed.

ONE HUNDRED NINETY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by ROSS GOLDSTEIN.

ONE HUNDRED NINETY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by ROSS GOLDSTEIN.

ONE HUNDRED NINETY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

ONE HUNDRED NINETY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

ONE HUNDRED NINETY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

ONE HUNDRED NINETY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

TWO HUNDRETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced James Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

TWO HUNDRED FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced Dennis Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

TWO HUNDRED SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced Dennis Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

TWO HUNDRED THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced Dennis Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

TWO HUNDRED FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of USE OF A CHILD IN A SEXUAL PERFORMANCE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, knowing the character and content thereof, he employed, authorized, or induced Dennis Doe, a child less than sixteen years of age to engage in a sexual performance, to wit: the defendant did photograph the victim while he was being sexually abused by others.

TWO HUNDRED FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SODOMY IN THE SECOND DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, being eighteen years old or more, compelled others to engage in deviate sexual intercourse with James Doe, a person less than fourteen years old, to wit: the defendant compelled other children to contact their penis' to the anus of the victim.

TWO HUNDRED SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SODOMY IN THE SECOND DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, being eighteen years old or more, compelled others to engage in deviate sexual intercourse with James Doe, a person less than fourteen years old, to wit: the defendant did place his mouth on the victim's penis.

TWO HUNDRED SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986, in the County of Nassau, State of New York, subjected William Doe, a person less than eleven years old to sexual contact, to wit: the defendant did rub his penis on the victim's back.

TWO HUNDRED EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, subjected Lawrence Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987, in the County of Nassau, State of New York, subjected Lawrence Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED TENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch his penis.

TWO HUNDRED ELEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch his penis.

TWO HUNDRED TWELFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch his penis.

TWO HUNDRED THIRTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the victim touched the defendant's penis.

TWO HUNDRED FOURTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986, in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the victim touched the defendant's penis.

TWO HUNDRED FIFTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987 in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch his penis to the victim's penis.

TWO HUNDRED SIXTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987 in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED SEVENTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987 in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED EIGHTEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 15th day of December, 1986 to on or about the 27th day of March, 1987 in the County of Nassau, State of New York, subjected Dennis Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED NINETEENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE FIRST DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the County of Nassau, State of New York, subjected Patrick Doe, a person less than eleven years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED TWENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of SEXUAL ABUSE IN THE SECOND DEGREE, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, subjected James Doe, a person less than fourteen years old to sexual contact, to wit: the defendant touched his penis to the victim's back.

TWO HUNDRED TWENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of SEXUAL ABUSE IN THE SECOND DEGREE, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, subjected James Doe, a person less than fourteen years old to sexual contact, to wit: the defendant did touch the victim's penis.

TWO HUNDRED TWENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Leap Frog".

TWO HUNDRED TWENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Leap Frog".

TWO HUNDRED TWENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Leap Frog".

TWO HUNDRED TWENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Simon Says".

TWO HUNDRED TWENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Simon Says".

TWO HUNDRED TWENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Simon Says".

TWO HUNDRED TWENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Simon Says".

TWO HUNDRED TWENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Simon Says".

TWO HUNDRED THIRTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Super Hero".

TWO HUNDRED THIRTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Super Hero".

TWO HUNDRED THIRTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

TWO HUNDRED THIRTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant masturbating into a cup.

TWO HUNDRED THIRTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of ROSS GOLDSTEIN.

TWO HUNDRED THIRTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of ROSS GOLDSTEIN.

TWO HUNDRED THIRTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of ROSS GOLDSTEIN.

TWO HUNDRED THIRTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the

County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of ROSS GOLDSTEIN.

TWO HUNDRED THIRTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of ROSS GOLDSTEIN.

TWO HUNDRED THIRTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed children engaged in sexual acts at the direction of the defendant during a game entitled "Hora Bora Alice".

TWO HUNDRED FORTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Leap Frog", wherein sexual acts were committed.

TWO HUNDRED FORTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the

County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Leap Frog", wherein sexual acts were committed.

TWO HUNDRED FORTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Leap Frog", wherein sexual acts were committed.

TWO HUNDRED FORTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Simon Says", wherein sexual acts were committed.

TWO HUNDRED FORTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Simon Says", wherein sexual acts were committed.

TWO HUNDRED FORTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Simon Says", wherein sexual acts were committed.

TWO HUNDRED FORTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Simon Says", wherein sexual acts were committed.

TWO HUNDRED FORTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Simon Says", wherein sexual acts were committed.

TWO HUNDRED FORTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Super Hero", wherein sexual acts were committed.

TWO HUNDRED FORTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Super Hero", wherein sexual acts were committed.

TWO HUNDRED FIFTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant masturbating into a cup.

TWO HUNDRED FIFTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED FIFTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Hora Bora Alice", wherein sexual acts were committed.

TWO HUNDRED FIFTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant masturbating into gum and then distributing it to children to chew.

TWO HUNDRED FIFTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of William Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant licking out M & M's from a child's underpants.

TWO HUNDRED FIFTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant contact a child's anus with the defendant's penis.

TWO HUNDRED FIFTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant hold a child while that child placed his mouth on the penis of ROSS GOLDSTEIN.

TWO HUNDRED FIFTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant contact the anus of a child with the defendant's penis.

TWO HUNDRED FIFTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of ROSS GOLDSTEIN.

TWO HUNDRED FIFTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of ROSS GOLDSTEIN.

TWO HUNDRED SIXTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of ROSS GOLDSTEIN.

TWO HUNDRED SIXTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of ROSS GOLDSTEIN.

TWO HUNDRED SIXTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of ROSS GOLDSTEIN.

TWO HUNDRED SIXTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of ROSS GOLDSTEIN.

TWO HUNDRED SIXTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch his penis to children.

TWO HUNDRED SIXTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the

County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SIXTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SIXTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SIXTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SIXTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SEVENTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SEVENTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant compelling children to expose their penis' while the defendant measured them.

TWO HUNDRED SEVENTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Three Muskateers", wherein sexual acts were committed.

TWO HUNDRED SEVENTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Three Muskateers", wherein sexual acts were committed.

TWO HUNDRED SEVENTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Three Muskateers", wherein sexual acts were committed.

TWO HUNDRED SEVENTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant's exposed penis.

TWO HUNDRED SEVENTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to observe a computer disc entitled "Dirty Movie" depicting a naked woman touching her vagina.

TWO HUNDRED SEVENTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to observe a computer disc entitled "Strip Poker" depicting a naked female.

TWO HUNDRED SEVENTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to observe a computer disc entitled "Stroker", depicting a hand masturbating a penis.

TWO HUNDRED SEVENTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed a child placing his mouth on the penis of the defendant while JESSE FRIEDMAN held the child.

TWO HUNDRED EIGHTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant contact the defendant's penis to the anus of a child.

TWO HUNDRED EIGHTY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant contact the defendant's penis to the anus of a child.

TWO HUNDRED EIGHTY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED EIGHTY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED EIGHTY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED EIGHTY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the

County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED EIGHTY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED EIGHTY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant touch the penis of JESSE FRIEDMAN.

TWO HUNDRED EIGHTY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Nude Limbo" wherein children were naked.

TWO HUNDRED EIGHTY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner

likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Three Muskateers" wherein sexual acts were committed.

TWO HUNDRED NINTIETH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Three Muskateers" wherein sexual acts were committed.

TWO HUNDRED NINETY-FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of James Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant participating in a game entitled "Three Muskateers" wherein sexual acts were committed.

TWO HUNDRED NINETY-SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Lawrence Doe, a male child, less than sixteen years old, to wit: the defendant showed the victim pictures of naked people.

TWO HUNDRED NINETY-THIRD COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the

County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Lawrence Doe, a male child, less than sixteen years old, to wit: the defendant directed a child to stand in the corner of the room and rub his exposed penis up against the wall.

TWO HUNDRED NINETY-FOURTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Lawrence Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to observe a computer disc entitled "Strip Poker" depicting a naked female.

TWO HUNDRED NINETY-FIFTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Lawrence Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to observe a computer disc entitled "Sex Style Test" which asked sexually related questions.

TWO HUNDRED NINETY-SIXTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Lawrence Doe, a male child, less than sixteen years old, to wit: the defendant permitted the victim to observe a computer disc entitled "Dirty Movie" depicting a naked woman touching her vagina.

TWO HUNDRED NINETY-SEVENTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Daniel Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant sexually abuse children.

TWO HUNDRED NINETY-EIGHTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of March, 1986 to on or about the 1st day of July, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Daniel Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant sexually abuse children.

TWO HUNDRED NINETY-NINTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Daniel Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant sexually abuse children.

THREE HUNDREDTH COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, ROSS GOLDSTEIN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, ROSS GOLDSTEIN, from on or about the 1st day of September, 1986 to on or about the 31st day of December, 1986 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Daniel Doe, a male child, less than sixteen years old, to wit: the victim observed the defendant sexually abuse children.

THREE HUNDRED FIRST COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the

County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Patrick Doe, a male child, less than sixteen years old, to wit: the defendant showed him pictures of naked people.

THREE HUNDRED SECOND COUNT

AND THE GRAND JURY OF THE COUNTY OF NASSAU, by this indictment, further accuse the defendant, JESSE FRIEDMAN, of the crime of ENDANGERING THE WELFARE OF A CHILD, committed as follows:

The defendant, JESSE FRIEDMAN, from on or about the 1st day of January, 1987 to on or about the 1st day of April, 1987 in the County of Nassau, State of New York, knowingly acted in a manner likely to be injurious to the physical, mental and moral welfare of Patrick Doe, a male child, less than sixteen years old, to wit: the defendant showed him pictures of naked people.

All of the acts and transactions alleged in each of the several counts of this indictment are connected together and form part of a common scheme and plan.

Dated: November 7, 1988


DENIS DILLON
District Attorney

IND NO. 69783

COUNTY COURT : COUNTY OF NASSAU

THE PEOPLE OF THE STATE OF NEW YORK

— against —

JESSE FRIEDMAN and ROSS GOLDSTEIN,
(as a juvenile offender under Counts
2, 4, 6, 8, 42, 109, 110, 111, 112,
113, 114, 121, 122, 123 and 124);

Defendant

DENIS DILLON
District Attorney

INDICTMENT FOR

As to Jesse Friedman:

Sodomy, First Degree (126 Counts)
Sodomy, Second Degree (1 Count)
Sexual Abuse, First Degree (9 Counts)
Sexual Abuse, Second Degree (1 Count)
Use of a Child in a Sexual
Performance (9 Counts)
Endangering Welfare of a Child
(52 Counts)

As to Ross Goldstein:

Sodomy, First Degree (78 Counts)
Sodomy, Second Degree (1 Count)
Sexual Abuse, First Degree (4 Counts)
Sexual Abuse, Second Degree (1 Count)
Use of a Child in a Sexual
Performance (5 Counts)
Endangering Welfare of a Child
(29 Counts)

A TRUE BILL

Kathleen A. O'Shea

Foreman

A-1505

2. The purpose of this Declaration is to put before the Court a) a summary of the allegations brought against Jesse in the Nassau County Indictments 67104 (December 7, 1987), 67430 (February 1, 1988), 69783 (November 7, 1988); b) the attributions of specific allegations to the complaining “Doe” witnesses; c) a summary of the three investigative phases of the original, 1987-1988 Nassau County Police Department investigations into the Friedmans; and d) an analysis of the allegations in light of the exculpatory statements provided by the 12 non-complaining students from the Friedman classes in which abuse was alleged.

4. The counts charged against Jesse Friedman were all alleged to have occurred during computer classes which took place in a small room on the ground floor of the Friedman home. Created by Gavin de Becker and Emily Horowitz, in their paper,

“Destruction of Innocence, The Friedman Case: How Coerced Testimony & Confessions Harm Children, Families & Communities for Decades After the Wrongful Convictions Occur”, National Center for Reason and Justice (May 2013), the following representations, true and to scale, are of the small room in which the Friedman computer



classes occurred:

Exhibit 2 - Computer Classroom in the Friedman Home



Exhibit 3 - Exposed view from outside the classroom

THE THREE INDICTMENTS

5. Jesse was charged with a total of 235 counts in the 1988 Nassau County Indictments 67104, 67430, 69783. There were 14 Complaining “Doe” witnesses who were responsible for the allegations underlying the 235 counts.

Indictment 67104 (“The 1st Indictment”)

6. Of the 54 charges brought in the first indictment, 10 were brought against Jesse. Four complaining witnesses were named in these 10 counts: William Doe (named in four counts)¹, Barry Doe (two), and Kenneth Doe (four).

Indictment 67430 (“The 2nd Indictment”)

7. Of the 68 charges brought in the second indictment, 29 were brought against Jesse. Six complaining witnesses were named in these 29 counts: Dennis Doe (four), Stephen Doe (one), Richard Doe (two), Keith Doe (two), Fred Doe (eight), and Edward Doe (10).

Indictment 69783 (“The 3rd Indictment”)

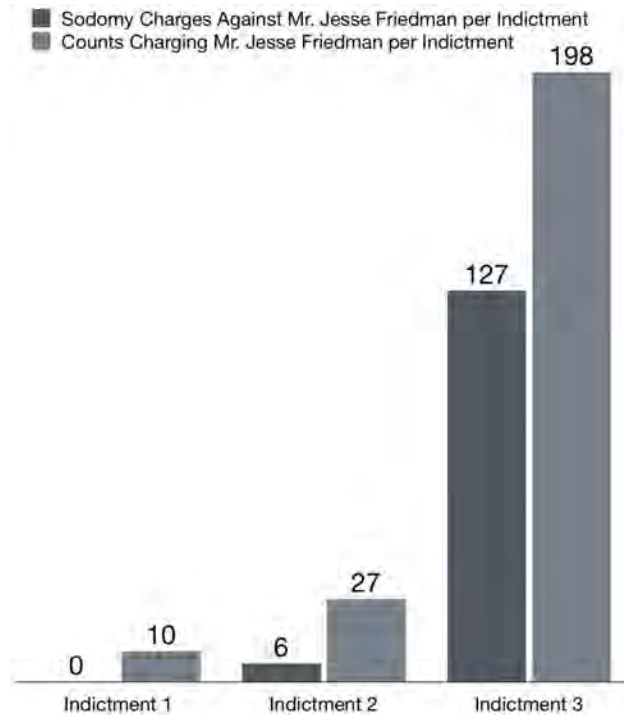
8. Of the 302 charges brought in the third indictment, 198 made allegations against Jesse. Seven complaining witnesses were named in these 198 counts: William Doe (34), Dennis Doe (27), Daniel Doe (54), James Doe (29), Lawrence Doe (10), Patrick Doe (9), and Gregory Doe (35).

TRAJECTORY OF ALLEGATIONS

9. The proportion of each indictment which charged Jesse increased with each indictment. Jesse is named in 10 counts (18.52%) of the 1st Indictment, 27 counts (39.71%) of the 2nd Indictment, and 198 counts (65.56%) of the 3rd Indictment; a 65.12% increase from Indictment 1 to Indictment 2, and a 254% increase from Indictment 2 to 3. The 1st Indictment charged Jesse with zero counts alleging sodomy; the 2nd Indictment charged him with six counts of sodomy in the first degree (a class B

¹ In this section, the numeral in parenthetical will refer to the number of counts in which a particular complaining witness was named in an indictment.

felony), and the 3rd Indictment charged him with 127 counts of sodomy in the first degree, a 188.6% increase. The following graph illustrates the enormous increase both in number of counts and in severity of charges from the 1st Indictment to the 3rd Indictment.



THREE PHASES OF THE INVESTIGATION

10. The Rice Report disclosed previously unknown information about the three phases of the original investigation. The following graphic demonstrates how many times each of the 14 complaining witnesses was visited by detectives, on what date (if known), and whether a formal statement was taken (as noted by the dates highlighted in blue). It is noteworthy that, according to the Rice Report, at least ten interviews were conducted

with children that yielded no formal statement — of course, the 25 formal statements that were taken have never been disclosed to the defense.

11. The names highlighted in red are the nine complaining witnesses whom the Conviction Review team did *not* interview². The counts attributed to these nine individuals make up more than 70% of the charges brought against Jesse Friedman; three of the four complaining witnesses to whom the highest number of counts in the indictments were attributed were not interviewed in the Conviction Review process.

Witness	Doe Name	1st Visit	2nd Visit	3rd Visit	4th Visit	5th Visit	Counts
5	Daniel Doe	Unknown	11/30	6/21	10/13		54
7	William Doe	11/17	11/23	11/30	6/3	6/15	38
2	Gregory Doe	Undated	5/19				35
15	Dennis Doe	12/16	6/7	10/25			31
11	James Doe	Unknown	6/14				29
9	Lawrence Doe	Unknown	5/19				10
16	Edward Doe	12/17	5/18				10
8	Patrick Doe	11/12	12/8	6/8			9
17	Fred Doe	11/19	12/3	Unknown	4/29	6/9	8
10	Kenneth Doe	11/23					4
3	Keith Doe	12/10					2
13	Richard Doe	12/2	11/1				2
14	Barry Doe	11/24	11/27				2
1	Stephen Doe	12/9					1

WILLIAM DOE AND DENNIS DOE

12. Two of the four complaining witnesses whose testimony yielded the greatest number of indictment counts naming Jesse Friedman were named in multiple indictments — William Doe was named in the first and third; Dennis Doe was named in the second and third. The extreme increase in the severity and number of allegations made by

² See Trivedi Decl. at fn. 2. The numbers listed in the ‘Witness’ column are the anonymous identifiers referenced in the Rice Report. An analysis of all available data enabled me to identify who each complaining witness was and what they were anonymously identified as in the Rice Report.

William between the first and third indictments, and Dennis between the second and third indictments, is noteworthy, and described at length *herein*.

13. In the 1st Indictment William Doe set forth allegations underlying 4 counts of Endangering the Welfare of a Minor (which allegedly occurred between October, 1986 - January, 1986). In the 3rd Indictment, that number rose to 34 charges - 11 of which included Sodomy - and allegedly occurred both prior to (March, 1986 - July 1986) and at the same time as (September, 1986 - December, 1986) the charges in Indictment 1. Put another way, William Doe recalled *the most egregious, violent conduct (with multiple allegations naming the presence of additional perpetrators)*, later in his discussions with law enforcement. This pattern, and the specific allegations made by William Doe in each indictment both raise questions about the integrity of his testimony.³

FIRST INDICTMENT

The Defendant touched Arnold Friedman's penis in front of the victim (45);

The Defendant touched his penis to the anus of Arnold Friedman in front of the victim (46);

The Defendant did touch the penis of a child under the age of sixteen years of age in the victim's presence (49);

The Defendant did the following: 1 - the Defendant did touch the penis of Arnold Friedman in front of the victim; 2 - the Defendant did touch his penis to the anus of Arnold Friedman in front of the victim; 3 - the Defendant did touch the

THIRD INDICTMENT

Friedman touched his penis to the anus of William Doe while Ross Goldstein held William down (1);

Friedman engaged in "deviate sexual intercourse" with William Doe by "forcible compulsion (2);

Goldstein engaged in "deviate sexual intercourse" with William Doe while Jesse held him down (3);

Jesse and Goldstein engaged in deviate sexual intercourse with William Doe by forcible compulsion (4);

The Defendant did place his mouth on the victim's penis (35);

Defendant engaged in deviate sexual intercourse by forcible compulsion (36);

The Defendant did contact the victim's anus with the Defendant's penis (37);

³ The numbers that appear in parentheticals reflect the count number of the Indictment.

The Defendant did photograph the victim engaged in a game entitled "Simon Says" wherein acts of sexual abuse were committed (191);

The Defendant did photograph the victim engaged in a game entitled "Leap Frog" wherein acts of sexual abuse were committed (192);

The Defendant did photograph the victim engaged in a game entitled "Super Hero" wherein acts of sexual abuse were committed (193);

The Defendant did rub his penis on the victim's back (207);

The victim observed children engaged in sexual acts at the direction of the Defendant during a game entitled “Leap Frog” (222);

The victim observed children engaged in sexual acts at the direction of the Defendant during a game entitled “Leap Frog” (223);

The victim observed children engaged in sexual acts at the direction of the Defendant during a game entitled “Leap Frog” (224);

The victim observed children engaged in sexual acts at the direction of the Defendant during a game entitled “Simon Says” (225);

The victim observed children engaged in sexual acts at the direction of the Defendant during a game entitled “Simon Says” (226);

The victim observed children engaged in sexual acts at the direction of the Defendant during a game entitled “Simon Says” (227);

The victim observed children engaged in sexual acts at the direction of the Defendant during a game entitled “Simon Says” (228);

The victim observed children engaged in sexual acts at the direction of the Defendant during a game entitled “Simon Says” (229);

The victim observed children engaged in sexual acts at the direction of the Defendant during a game entitled “Super Hero” (230);

The victim observed children engaged in sexual acts at the direction of the Defendant during a game entitled “Super Hero”(231);

The victim observed the Defendant's exposed penis (232);

The victim observed the Defendant masturbating into a cup (233);

The victim observed the Defendant touch the penis of Ross Goldstein (234);

The victim observed the Defendant touch the penis of Ross Goldstein (235);

The victim observed the Defendant touch the penis of Ross Goldstein (236);

The victim observed the Defendant touch the penis of Ross Goldstein (237);

The victim observed the Defendant touch the penis of Ross Goldstein (238);

The victim observed children engaged in sexual acts at the direction of the Defendant during a game entitled “Hora bora Alice” (239).

The Defendant did contact the victim's anus with the Defendant Friedman's penis while Defendant Goldstein was holding the victim (5);

The Defendant engaged in deviant sexual intercourse with William Doe by forcible compulsion (6);

The Defendant Goldstein did contact the victim's anus with the Defendant Goldstein's penis while the Defendant Friedman held the victim (7);

The Defendants engaged in deviant sexual intercourse with William Doe by forcible compulsion (8);

The victim observed the Defendant licking m&m's from a child's underpants (254).

14. In the 2nd Indictment Dennis Doe is named in four charges against Jesse (2 allegedly occurred between January, 1986 - March, 1986 and the remaining two, between April, 1986 - June 1986). In the 3rd Indictment, Mr. Friedman was named in 25 charges by Dennis Doe, 16 of which charge Jesse with Sodomy.

Defendant did contact the victim's anus with the Defendant's penis while Arnold Friedman held the victim (21);

Defendant engaged in deviate sexual intercourse with
Dennis Doe, by forcible compulsion (22);

The Defendant did contact the victim's anus with the Defendant's penis while Arnold Friedman held the victim (23);

Defendant engaged in deviate sexual intercourse with
Dennis Doe by forcible compulsion (24);

The Defendant did touch the victim's penis (215);

The Defendant did touch the victim's penis (216).

“VICTIM OBSERVED”

15. Dozens of counts involve a witness testifying at the grand jury that they “observed” Jesse Friedman engage in inappropriate and abusive acts **involving either other victims, or physical evidence**. By definition, these acts can be corroborated. And yet, many of them are either not corroborated, or utterly refuted. The Rice Report does not engage in this analysis, or acknowledge which counts have been refuted; as such, the defense has taken it upon itself to summarize these troubling results here.

11 counts charging Jesse allege that the victim “observed the defendant touch the penis of Ross Goldstein.” And yet, Ross Goldstein denies, categorically, that any such thing took place.

7 counts charging Jesse allege that the victim “observed the defendant compelling children to expose their penises while the defendant measured them” and yet, not a single child, claims that the defendant measured their penis.

3 counts charging Jesse allege that the victim “observed the defendant hit **several** boys” and yet not one (let alone several) boys allege being hit by Jesse.

16. Since Arnold and Jesse's arrest, law enforcement has possessed each and every class roster that documents the identities of the computer class students as well as the classes which they attended. In 1987 Arnold and Jesse thus devoted tremendous time and energy to reconstructing class rosters in order to identify the specific classes in which abuse was being alleged (Arnold and Jesse had run dozens of classes over the course of several years with potentially hundreds of students) and potential exculpatory witnesses. What follows is an analysis based upon those reconstructions — because the indictments made out allegations attributed to specific complaining witnesses in specific time periods, and because the identities of the fourteen complaining witnesses has been in the defense's possession since 1988, much can be known about each class in which abuse was alleged. Of Arnold and Jesse's hundreds of students, this analysis only accounts for responsive witnesses - students from whom the Conviction Review and defense team have obtained statements.

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1986 Winter Basic 1	1986 Spring Game Maker	1986 Spring Basic 1	1986 Spring Basic 2	1986 Fall Basic 2	1986 Fall Music	1987 Winter Basic 1	1987 Spring Basic 2	1987 Fall Basic 4
Dennis Doe	William Doe	Daniel Doe	Dennis Doe	Stephen Doe	William Doe	Barry Doe	Gregory Doe	Richard Doe
	James Doe	Fred Doe		Richard Doe	James Doe	Lawrence Doe	Edward Doe	Dennis Doe
		Edward Doe		Keith Doe		Patrick Doe	Kenneth Doe	William Doe
		Keith Doe		Fred Doe		Gregory Doe	Barry Doe	Kenneth Doe
		Stephen Doe		Edward Doe		Keith Doe		
				William Doe		Kenneth Doe		
				Dennis Doe				
				Daniel Doe				

18. Five original complaining witnesses - Dennis Doe, Keith Doe, Stephen Doe, Barry Doe, and Kenneth Doe - have all repudiated their allegations against Jesse. A sixth - James Doe - recanted every allegation made involving Ross Goldstein. Allegations involving Ross Goldstein constituted 60% of the original counts returned as a result of James Doe's testimony.

19. 12 former computer students - Dan Aibel, ADA Jesse Aviram, Chris Blaha, Michael Epstein, James Forest, Ron Georgalis, Michael Kanefsky, Rafe Lieber, Shahar Lushe, Gary Meyers, Jeff Meyers (who, today, goes by Jeff Leff), and David Zarrin - all of whom attended at least one of each of the classes in which abuse was alleged by the original complaining witnesses, have clearly and unequivocally asserted that no sexual abuse took place.

20. The following visual demonstrates the manner in which the allegations attributed to William, Daniel, Edward, Fred, Lawrence, and Patrick Doe have been impeached by the recantations of the five complaining witnesses and the exculpations of the 12 former students. Because the prosecution has questioned the credibility of both Richard and Gregory, and taking into account the recantations and exculpations of complaining and non-complaining witnesses, there is not a single complaining witness who remains unimpeached.

1986 Winter Basic 1	1986 Spring Game Maker Class	1986 Spring Basic 1	1986 Spring Basic 2	1986 Fall Basic 2	1986 Fall Music Class	1987 Winter Basic 1	1987 Spring Basic 2	1987 Fall Basic 4
Dennis Doe	William Doe	Daniel Doe	Dennis Doe	Daniel Doe	William Doe	Lawrence Doe	Edward Doe	William Doe
ADA Aviram	James Doe	Fred Doe	ADA Aviram	William Doe	James Doe	Patrick Doe	Gregory Doe	Richard Doe
	Rafe Lieberman	Stephen Doe		Edward Doe	Rafe Lieberman	Gregory Doe	Kenneth Doe	Michael Epstein
	Gary Meyers	Keith Doe		Fred Doe	Gary Meyers	Keith Doe	Barry Doe	Dennis Doe
		David Zarrin		Richard Doe		Kenneth Doe	Michael Epstein	Kenneth Doe
				Stephen Doe		Michael Epstein		
				Keith Doe		Michael Kanefsky		
				Dennis Doe		Barry Doe		
				David Zarrin				
				Chris Blaha				

Strike through = witnesses who have been discredited by the prosecution; Green = witnesses who have either recanted or deny that any abuse ever took place; Grey = witnesses whose credibility is brought into question by witnesses who have either recanted or deny that abuse ever took place.


21. Taken together - the partial and full recantations by the 14 complaining witnesses, the impeachment by the unambiguous testimony of their classmates and peers, and the 2013 recantation by Mr. Goldstein - there does not appear to be a single complaining witness who remains unimpeached or uncontradicted.

Dated: New York, NY
November 5, 2020

SWORN BEFORE ME
THIS 6th of November, 2020.

RHIDAYA S. TRIVEDI
Notary Public, State of New York
No. 02TR6370720
Qualified in New York County
Commission Expires 2/5/2022

Respectfully submitted,


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wp/8/587

STATEMENT OF

My name is _____ and I am 8 years old, my birthday is on _____. I live on _____, New York, with my _____, mother and father. My telephone # is _____. I also go to the _____ school and I am in the _____ grade.

I want to say that I have told Detective Merriweather that I know the difference between telling a lie and telling the truth and everything that I am telling Detective Merriweather the truth about what happened to me. My mom and dad are present with me and I am telling the truth.

I want to say that I had attended computer lessons for two times with Mr. Friedman. I can't remember the name of his street. I know who he is and how to get to his house from my house. I went to Mr. Friedman's computer school for the first time in September 1986 for 10 weeks and it was on _____ every time and it was about 4:30 p.m. in the afternoon each time. I also had some of my friends in my computer class were _____ myself and another _____ named _____ and I think his class is something like _____. All of us were just about the same

**A-1520**

2.

age except for _____ who is in the 4th grade and _____ who could be in either the 4th or 5th grade. I can remember that when I would go into Mr. Friedman's school he had his son Jesse help him out in the classes. I remember seeing some magazines of naked boys in Mr. Friedman's house in his downstairs bathroom. I remember seeing these magazines for about all the time on the back of the toilet. I also remembered that I saw some computer disc programs at Mr. Friedman's showing naked people and people taking their clothes off. I also remember seeing some disc that had a man talking from his shoulderes up and sometimes I remember it say to us, to take our pants off. These things were already on the screen on one of the computers in the class. I also remember there was one program that used the talk about parts of the body. Mr. Friedman used to load the computers and when the programs that told us to take off our clothes we would just listen to them. I used to sit in the middle of two other people, mostly between _____ and _____ and _____ sat next [to] me exactly, because he and I used the Apple Computer and the other guys used the Commodore 64 Computers. The reasons why I sat in the middle was to try and keep Mr. Friedman and his son Jesse from giving me bad touches. I remember seeing Mr. Friedman and Jesse give bad touches and do some bad things to me and the other boys in the class. I want to say that during about

3.

my second and third time in the 1st session that Mr. Friedman would sneak up behind me and take his hand and push it down into my pants and then he would touch my penis. He did this to me two times and I would squirm around and he would tell me to stop moving around and [I] would tell him to stop, but Mr. Friedman would keep doing it anyway to me. Mr. Friedman would also do this to _____ and sometimes _____ would tell him to stop for me. I also remember that Jesse used to hit _____ a lot and I was also hit too by Jesse in my rear end. I also remember that Jesse would hit me more when I told his father not to touch me on my penis. Also, Mr. Friedman used to touch my behind when my pants were up about two times and he also did the same thing two times when my pants were down. Mr. Friedman's son Jesse did the exact same thing to me as his father did. He would touch my behind when my pants were down, two times and he did the same two times when my pants were up. I told Jesse to stop and he would just say to me to be quiet. I can remember this happening to everyone in the class and even to some other kids in the class whose names I can't remember. I can also remember that Jesse used sneak up from behind me and he would slide his hands the same way his father did. First, he would touch my shoulders then down my chest and into my pants. He would touch my penis with his hand for a while then he would stop. Jesse did this to

4.

me two times, the first time in the September 1986 session and one time in the [] 1987 session as far as I can remember. I also remember Mr. Friedman and Jesse doing some other things to me and to the other boys in the class and they hurt me and the others very much, so much that I cried and I called for my mommy and so did the others call for their moms and dads. When we called out and screamed I was told to shut up and sometimes my mouth was covered up so I could not cry and scream. This was done to the other boys in the class and I think that _____ was hit the most by Mr. Friedman and by Jesse but he did not do it as much as his father did to _____. But, both of them used the hit me. I want to say that during this session Mr. Friedman came up to me in one of the classes and he told me to pull my pants down. This time he did not touch my penis like he did before sometimes, instead Mr. Friedman told me to pull them down and I said no, and he got mad and hit me and then I tried to hold onto my pants. I wish I would have kicked Mr. Friedman, but Jesse, was standing there and he would have kicked me back much harder. Mr. Friedman pulled my pants half-way down and he made me hold onto one of the computer table chairs and then I was made to bend over and Mr. Friedman was holding me very tight around my waist and he took his penis and while squirming trying to get away from him, he pushed his penis into my behind and

5.

it hurt me very much. I screamed dad and Mr. Friedman said to me to be quiet. He kept on pushing his penis into my behind and he tried to make it fit and I felt like I was going to make a dutty on him but I didn't. I wish I could have made a dutty on him but I didn't. Mr. Friedman put his hands over my mouth. During this time the other kids, were screaming and telling Mr. Friedman to get off of me. I was scared and the other kids were scared too. Jesse was telling everybody else to shut up. I also remember that he used to tell all of us that if we didn't shut up we were not going to be able to come back to computer class again. I really wanted to take computer so I never told anyone about what was going on except for my dog, _____. I can also remember when Mr. Friedman did this to me some sticky white, slimy stuff came out of his penis and it was yucky, gross, disgusting. I remembered a lot and and I used to come home and go into my bathroom and I would wash my underwear out because it had blood on it and it took a long time for me to wash my underwear out to get the blood off. I did that so my mother would not see the blood in my underwear. I didn't notice the blood until when I went to the bathroom when I got home. I washed them over also because Mr. Friedman had told me after he put his penis into my behind. Mr. Friedman did this to me one time in this first session. Also I remember that Jesse did the very